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March 26, 2010

**Via PACER E-File**

Magistrate Judge Michael Shipp  
United States District Court  
Martin Luther King, Jr.  
Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: **Marco Giunta v. Accenture LLP**  
**Civil Action No. 2:08-cv-3776-DRD-MAS**

Dear Judge Shipp:

This firm represents Defendant Accenture LLP in the above-captioned action. I am writing to request a one-month extension for the parties to submit dispositive motions in this case. The current deadline for such motions is April 9, 2010. Since the Court set that date, Accenture received Plaintiff's tax returns and brokerage records and conducted his continued deposition pursuant to this Court's February 17, 2010 Order.

During his continued deposition, Plaintiff testified that he "prepared" his own tax returns by gathering all of the necessary financial information for his accountant to file with the Internal Revenue Service. When asked what information he gave his accountant reflecting ownership of the Accenture stock which was listed on *all* of his individual tax returns from 2005 through 2007, Plaintiff testified that he did not know. To date, Plaintiff has not produced *any* evidence showing his ownership of any Accenture stock, yet said investments are claimed throughout all of his tax returns produced heretofore.

Therefore, both during, and after, Plaintiff's continued deposition which was held on March 24, 2010, Accenture requested that Plaintiff provide the documents that he gave to his accountant showing his ownership of Accenture stock or, in the alternative, to provide executed releases as required by this Court's February 17, 2010 Order, for the accountant to release the information provided to him for purpose of preparing Plaintiff's tax returns. Because the vesting of Accenture stock is a key issue in this case and Accenture's Motion for Summary Judgment, it is incumbent that we receive and analyze this information prior to filing such a motion.

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For these reasons, we respectfully request a one-month extension to file any Motion for Summary Judgment so that Plaintiff can provide Accenture with the information provided to his accountant.

Respectfully submitted,

WONG FLEMING, P.C.

A handwritten signature in black ink, appearing to read 'Wesley Bridges'. The signature is written over a horizontal line. Below the signature, the name 'Wesley Bridges' is printed in a small, sans-serif font.

Wesley Bridges

LW/lis

cc: Susan Burns

File No.: 2323.0001

So Ordered this 7<sup>th</sup> day  
of April, 2010  
Wesley Bridges